

William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
T: 212-813-8800
E: wweintraub@goodwinprocter.com
E: gfox@goodwinprocter.com

*Counsel for Hilliard Muñoz Gonzales LLP,
Thomas J. Henry Injury Attorneys, Girard
Gibbs LLP, and Jordan Hyden, Womble and
Culbreth P.C.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**RESPONSE OF CERTAIN NON-ISD PRE-CLOSING ACCIDENT
PLAINTIFFS TO THE OMNIBUS RESPONSES OF GENERAL
MOTORS LLC, WILMINGTON TRUST COMPANY, AS GUC TRUST
ADMINISTRATOR AND TRUSTEE, AND THE PARTICIPATING
UNITHOLDERS TO (A) THE NON-IGNITION SWITCH PLAINTIFFS'
GUC TRUST ASSET PLEADING AND (B) CERTAIN NON-IGNITION SWITCH
PRE-CLOSING ACCIDENT PLAINTIFFS' AMENDED RESERVATION OF RIGHTS**

Goodwin Procter, LLP, as counsel to Hilliard Muñoz Gonzales LLP, Thomas J. Henry
Injury Attorneys, Girard Gibbs LLP, and Jordan Hyden, Womble and Culbreth P.C., which firms
in turn represent the Non-Ignition Switch Pre-Closing Accident Plaintiffs¹ identified on Exhibit
A hereto (the "Non-ISD Pre-Closing Accident Plaintiffs"), responds to the Omnibus Responses

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Judgment entered in the above-captioned chapter 11 case on June 1, 2015 [ECF No. 13177] (the "Judgment"). So there is no misunderstanding, the Non-Ignition Switch Pre-Closing Accident Plaintiffs are not Non-Ignition Switch Plaintiffs as defined in the Judgment.

of Wilmington Trust Company, as GUC Trust Administrator and Trustee, and the Participating Unitholders to (A) the Non-Ignition Switch Plaintiffs' GUC Trust Asset Pleading and (B) Certain Non-Ignition Switch Pre-Closing Accident Plaintiffs' Amended Reservation of Rights [Docket Nos. 13351 and 13352] as follows:

1. The Judgment does not require the Non-Ignition Switch Pre-Closing Accident Plaintiffs to file a GUC Trust Asset Pleading to reserve rights.

2. There is no basis under the Judgment to construe the *Amended Reservation of Rights of Certain Non-ISD Pre-Closing Accident Plaintiffs* [Docket No. 13254] as a GUC Trust Asset Pleading. Indeed, the Non-ISD Pre-Closing Accident Plaintiffs have not filed late proofs of claim to date, which is a prerequisite to filing a GUC Trust Asset Pleading under paragraph 13(d) of the Judgment.

3. The Non-Ignition Switch Pre-Closing Accident Plaintiffs identified on Exhibit A restate and reaffirm the reservation of the rights afforded them under the Judgment and under applicable law. *See e.g.*, Judgment at ¶ 13(a) ("To the extent an issue shall arise in the future as to whether (i) the Non-Ignition Switch Pre-Closing Accident Plaintiffs and Non-Ignition Switch Plaintiffs were known or unknown creditors of the Debtors, (ii) the doctrine of equitable mootness bars the use of any GUC Trust Assets to satisfy late-filed claims of the Non-Ignition Switch Pre-Closing Accident Plaintiffs and Non-Ignition Switch Plaintiffs, or (iii) the Non-Ignition Switch Pre-Closing Accident Plaintiffs or Non-Ignition Switch Plaintiffs were otherwise bound by the provisions of the Sale Order, the Non-Ignition Switch Pre-Closing Accident Plaintiffs or Non-Ignition Switch Plaintiffs shall be required to first seek resolution of such issues from this Court before proceeding any further against New GM and/or the GUC Trust.").²

² It is worth noting that when quoting from paragraph 13(a) of the Judgment in its omnibus response, New GM chose to replace the above-quoted language with ellipses. *See Omnibus Response By General Motors LLC to (I) the*

Dated: August 7, 2015

Respectfully submitted,

/s/ William P. Weintraub

William P. Weintraub

Gregory W. Fox

GOODWIN PROCTER LLP

The New York Times Building

620 Eighth Avenue

New York, NY 10018

Tel.: 212.813.8800

Fax: 212.355.3333

wweintraub@goodwinprocter.com

gfox@goodwinprocter.com

Counsel for Hilliard Muñoz Gonzales LLP,

Thomas J. Henry Injury Attorneys,

Girard Gibbs LLP, and Jordan Hyden,

Womble and Culbreth P.C.

EXHIBIT A

Non-ISD Pre-Closing Accident Plaintiffs

1.	Adams, Ernest IARE Elizabeth Williams
2.	Akin, Allen
3.	Amsdill, Scott
4.	Ankerich, Niki
5.	Ashford, Gracie
6.	Ayers, Derick IARE Reid Ayers
7.	Bageon, Sheila
8.	Baker, Walter
9.	Bannarn, Dennis
10.	Barkwell, Linda IARE Randall Forrester
11.	Barner, Jasmine
12.	Barrett, Lowary
13.	Beachler, Ryan J.
14.	Beaulieu, Keri
15.	Becker, Patricia
16.	Bendermon, Athena
17.	Bendermon, Athena IARE Tony Bendermon
18.	Bennett, Virginia
19.	Blanchard, Geneva IARE James McAlister
20.	Blanton, Melinda
21.	Bonney, Mary
22.	Borer, Gerald R.
23.	Bowers, Johnnie
24.	Boyd, David
25.	Breuer, Patricia
26.	Brisky, Clinton
27.	Brooks, Michael
28.	Broom, Carrenyta
29.	Brown, Barbara
30.	Brown, Melinda iare Brenda Inman
31.	Brown, Woodrow
32.	Buhl, Kimberly
33.	Buie, Darell
34.	Burton, Shari
35.	Butler, Jeffrey
36.	Callahan, Gerald
37.	Callahan, Herbert
38.	Carney, Maurice
39.	Carolyn Polk IARE Polk, Terrance
40.	Carpenter, Charles iare Brenda Inman
41.	Casey, Isaac
42.	Cason, Kiara
43.	Cason, Lavecica
44.	Cavins, Jane
45.	Cazes, Keagan
46.	Cazes, Kristi
47.	Chapman, Edgar
48.	Charlot, Alison iare Alonzo Charlot
49.	Chevalier, Justin

50.	Clanton, Joseph
51.	Clark, Leo
52.	Coleman, Rhonda S. IARE Jeffrey Coleman
53.	Connelly, Thomas
54.	Contreras, Darius
55.	Contreras, Gabriel
56.	Contreras, Melissa
57.	Craft, Billie
58.	Craft, Gary
59.	Creech, Kerry
60.	Crew, Richard
61.	Cunningham, Eric
62.	Curry, Annie
63.	Curry, Jacqueline
64.	Damouth, Robin
65.	Davis, Donna iare Kendra Davis
66.	Davis, Saint
67.	Delk, Brittany
68.	Delk, Sherille IANF Timothy Delk
69.	Delk, Valeria
70.	Demps, Jr., Willie Gene
71.	Demps, Virginia
72.	Dockett, Curlee
73.	Donnell, Ieisha
74.	Donnell, Lisa
75.	Donnell, Michelle R.
76.	Douglas, Thomas
77.	Drake, Stephen
78.	Dunbar, Alternetta
79.	Duncan, Lynda
80.	Dunson, Jamie
81.	Edwards, Cedric
82.	Edwards, Kahlil
83.	Edwards, Shan
84.	Everwein, Stacie
85.	Faulk, Sarah
86.	Faulkner, Bennie POA Elsie Faulkner
87.	Floyd, Delores
88.	Fowler, Joseph
89.	Freeman, Gertrude
90.	Fugate, Wanda
91.	Fusilier, Raymond
92.	Gaston Jr, Darryl R
93.	Gautreau, Keith
94.	Ghesquiere, Dan
95.	Goad, Lisa iare Justin Wayne Goad
96.	Gonser, LuAnn
97.	Gonzales, Simon
98.	Gonzalez, Deborah iare Roberto D. Gonzalez
99.	Gracia, Christopher
100.	Green, Dorothy
101.	Gregory, Brenda
102.	Grigorenko, Stephanie IARE Stephen Grigorenko

103.	Grooms, Terry G.
104.	Harmenyer, Linda
105.	Harmeyer, Linda
106.	Hastings, Lucretia
107.	Hawkins, Carolyn iare Tamia Williams
108.	Haynes, Hazel IARE Jennifer Whitehorn
109.	Henley, Robert
110.	Hernandez, Jennifer
111.	Hernandez, Salvador IARE Amber Hernandez
112.	Hicks, Jennie iare Alphonso Hicks
113.	Higginbotham, Connie
114.	Higginbotham, David
115.	Hill, Raymond
116.	Hillman, Diana
117.	Howard, Tanya
118.	Howard, Tom
119.	Hudson Fugate, Nancy
120.	Hugs, Sherri
121.	Ivy, Melton
122.	Jackson, Mary
123.	Jaure, Nicole
124.	Johannessen, Roy
125.	Johnson, Margaret IANF Bryan Johnson IARE Robert Brian Johnson
126.	Johnson-Brooks, Alberta
127.	Kavanaugh, Michael IARE Norman Kavanaugh
128.	Kennedy, Naomi
129.	Kersey, Patricia IARE Carl Beale
130.	Korona, Richard
131.	Kunc, Linda
132.	Lamoreaux, Leonard
133.	Lapio, Ralph
134.	Laskey, Greg
135.	Leatherwood, Brenda
136.	Lee, Wanda
137.	Lesesne, Cheryl
138.	Lett, Tony Sr. IARE Tony Lett, Jr.
139.	Lynn, Kenneth A.
140.	Machado, Austin IARE Marie Machado
141.	Machado, Charlotte IARE Marie Machado
142.	Machado, Socrates IARE Marie Machado
143.	Maloney, Margaret
144.	Mann, Shanna
145.	Mansouri, Rchid IARE Juanita Mansouri
146.	Manuel, Timothy IARE Jessie Washington
147.	Marshall, Tammie
148.	May, Allen
149.	McCarroll, Robert
150.	McClain, Mitchell
151.	McDole, Willie
152.	McDonnell, Ron IARE Phyllis McDonnell
153.	Mecum, Jr., Franklin
154.	Meyers, Gail
155.	Montgomery, Julie

156.	Montz, Jessica
157.	Montz, Joseph
158.	Moore, Kortney
159.	Morris, Clarence
160.	Myles, Yvette
161.	Nelson, Shemeka
162.	Nichols, Christeen
163.	Nichols, Richard
164.	Norton, Sonja
165.	O'Hare, John
166.	Ortega, Santana
167.	O'Shields, Mary iare Brenda Inman
168.	Outland, Christy
169.	Owens, Janice
170.	Paine, Joshua
171.	Pantiledes, Steven
172.	Parker, Ryan
173.	Parker, Sonja
174.	Pearson, Denise IARE John Pearson
175.	Peete, Getta
176.	Pennell, Janet
177.	Peoples, Lisa IANF Outland, Wesleigh
178.	Perrin, Dennis
179.	Perry, Cordelia
180.	Peters, Joe
181.	Pisano, Rose
182.	Plante, Travis
183.	Postley, Kyomi
184.	Postley, Kyomi Ianf Tiffany Postley
185.	Powell, Martinique
186.	Powell, Ryan
187.	Prewet, Pamela
188.	Prewitt, Vernice
189.	Purdy, Anna
190.	Quinn, Ben
191.	Ragsdale, Vonda iare Dorothy Davis
192.	Ramadi, Muntaha
193.	Ramsey, Joyce
194.	Ringer, Michelle IANF Esperanza Reyna iare Mariano Reyna
195.	Ringer, Michelle IANF Mariano Reyna, Jr. iare Mariano Reyna
196.	Ringer, Michelle iare Mariano Reyna
197.	Robin, Amanda
198.	Robinette, Larry
199.	Robinson, Mario
200.	Robinson, Monica ianf Ty' Shunn Robinson
201.	Robinson, Shamoya
202.	Rodemann, Crystal
203.	Rodemann, Gilbert
204.	Rodemann, Jason
205.	Rodemann, Rose
206.	Rodgers, Dennis IARE Sarah Rogers
207.	Rogers, Timothy

208.	Ronald Thomas
209.	ROYALSTON, CHELSEA T. IARE Royalston, Damonti
210.	Ruiz, Rachel
211.	Russell, Chikoa
212.	Sandel, Kelly
213.	Schwamberger, Linda
214.	Scott, Randy
215.	Scott-Sherman, Raychell
216.	Scrutchens, Garrett
217.	Secord, Marilyn
218.	Sesson, Latasha
219.	Shipman, Sheila
220.	Short-Coleman, Yolanda
221.	Simmons, Tina IARE Kardarius Collins
222.	Sims, Derrius
223.	Sink, Holly
224.	Slucher, Larry
225.	Slucher, Larry IARE Angela Slucher
226.	Small, Kenneth
227.	Solomon, Jerald
228.	Sosa, Mike
229.	Sowers, Adam
230.	Suarez, Raymond
231.	Taylor, Virginia A.
232.	Thomas, Frank
233.	Thomas, Milton
234.	Townsend, Jennifer
235.	Tracy, Teresa
236.	Tracy, Teresa IARE Zachary Tracy
237.	Tyler, Jacqueline iare Altonio Tyler
238.	Upton, Debria IARE Timothy Upton
239.	Vail, Rodney
240.	Vaught, John
241.	Vogt, Valerie iare William Vogt
242.	Ward, Kenneth IARE Marie Machado
243.	Washington, Ricky
244.	Weatherford, Jody
245.	Wellington, James
246.	Westbrook, Sallie iare Samuel Westbrook
247.	Wilkinson, Jimmy
248.	Williams, Claudia
249.	Williams, Nylondra
250.	Williams, Nywondra IANF Myles, Lamarquis
251.	Wilson, Alexis
252.	Wilson, Fred iare Diane Grace Wilson
253.	Woods, Yvonne
254.	Wright, John and Octavia IARE Undrail Wright
255.	Young, Sylvia
256.	Zachow, Dustin
257.	Zander, Rebecca

Non-ISD Pre-Closing Accident Plaintiffs Inadvertently
Omitted From Initial Filing [ECF No. 13252]

1.	Douglas, Jamie IANF Shermaine Douglas
2.	Hawkins, Starlin
3.	Hunter, Wanda
4.	Myree, Mary
5.	Nieves, Angelo